



U.S. Department of Justice

950 Pennsylvania Avenue NW
Washington, D.C. 20530

August 23, 2024

By ECF

The Honorable Dale E. Ho
United States District Judge
U.S. District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. M/Y Amadea*, No. 23-cv-9304 (DEH)

Dear Judge Ho:

We write respectfully on behalf of the Government to request the Court's leave to file portions of the parties' joint letter regarding the location for Claimant Khudatainov's deposition under seal. Specifically, the Government requests that the identities of the countries discussed in the letter be sealed.

Disclosing the identities of the countries under consideration may undermine efforts to obtain approval of the deposition in those countries and would also disclose sensitive information regarding the United States' relations with foreign governments. In addition, Khudatainov has expressed concerns about his safe passage to certain countries and drawing public scrutiny to his potential future travel destination may contribute to those concerns.

Claimants consent to this request.

Respectfully submitted,

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cc: Claimants' counsel (by ECF)